

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL & FIRST-CLASS PACKAGE SERVICE
CONTRACT 1 (MC2013-5)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2013-5

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(October 19, 2015)

The United States Postal Service hereby moves for temporary relief, to allow the existing contract in this docket to remain in effect for thirty (30) additional days. The customer whose competitive product rates were established in this docket wishes to renew its commitment to sending large volumes of Priority Mail and First-Class Package Service for the next year at negotiated rates. By the terms of the contract filed in this docket, the current rates will expire on October 26, 2015.

The Postal Service and the customer have been working cooperatively over the past month to reach a new agreement, which would have avoided any interruption in the Postal Service's ability to provide this customer access to negotiated rates. However, negotiations have not concluded as of yet, because the customer is still reviewing the Postal Service's most recent proposal within its upper management. The negotiation process for the successor agreement has involved multiple proposals and counterproposals from each side, which has caused additional delay to this process. Nevertheless, the Postal Service expects that its most recent proposal will soon be approved by the customer, and that the parties will be able to finalize and sign the successor agreement.

Therefore, the Postal Service respectfully requests that the Commission grant a thirty (30) day extension to allow the existing contract to remain in effect. The thirty day time period would give the parties additional time to conclude negotiations, sign the new contract, and file it with the Commission more than 15 days in advance of the new expiration date. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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